

MACKEY PRICE & MECHAM

A Professional Corporation
Attorneys and Counselors at Law

American Plaza II
57 West 200 South, Suite 350
Salt Lake City, Utah 84101-3663

Telephone: (801) 575-5000
Fax: (801) 575-5006

Gifford W. Price

gprice@mackeyprice.com

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(Via Email – scc.chambers@nysb.uscourts.gov and ECF service)

The Honorable Shelley C. Chapman
United States Bankruptcy Court for
the Southern District of New York
One Bowling Green
New York, New York 10004

Re: In re: Lehman Brothers Holdings Inc., et al. (Case No. 08-13555 (SCC))

Dear Judge Chapman:

As before indicated, this law firm is counsel for SecurityNational Mortgage Company (“SecurityNational”) relative to Lehman Brothers Holdings Inc.’s (“LBHI”) “Motion To Enforce Automatic Stay, Plan And Confirmation Order Against iFreedom Direct Corp. and SecurityNational Mortgage Company (“Motion”)” in the above matter.¹

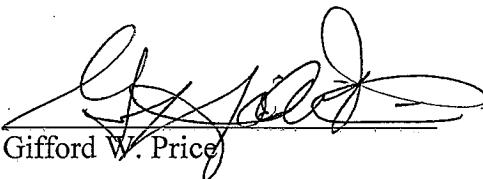
In its June 8, 2016 letter to Your Honor “to update the Court on the status” of the Delaware action, LBHI states that “a hearing on the motion to dismiss [Delaware] has been scheduled for July 20, 2016. The Plan Administrator’s motion to dismiss the Delaware Dec Action rests on numerous grounds entirely independent of the Motion to Enforce pending before Your Honor....” However, upon review of the June letter communication by the parties with the

¹ LBHI’s Motion was not filed in any adversary proceeding. However, since LBHI filed a letter dated June 8, 2016 in the above matter and in LBHI v. 1st Advantage Mortgage, L.L.C. et al. Adv. Proc. No. 16-01019, “for the record” this letter is also included in said adversary proceeding with the other letters. See also SecurityNational’s letter dated June 3, 2016 requesting the Court to rule on LBHI’s Motion as the SecurityNational - LBHI matters were not resolved, and SecurityNational’s letter dated June 9, 2016.

June 30, 2016
Page 2

Court, what is omitted relative to the Delaware "status" is that the matter of alleged violation of the automatic stay similar to the Motion before Your Honor is also an integral issue for which dismissal is sought in LBHI's Delaware "Motion To Dismiss Or, In The Alternative, To Stay This Action" (dated March 2, 2016) to be heard on July 20th.

Respectfully,



Gifford W. Price

cc: William A. Maher, Esq. (via Email – wmaher@wmd-law.com)
Michael A. Rollin, Esq. (via Email – mrollin@rbfattorneys.com)